

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

CHAD HILL, on behalf of himself and  
others similarly situated,

*Plaintiff,*

v.

PEPPERIDGE FARM, INC.,

*Defendant.*

Civil Action No. 3:22-CV-97

**DEFENDANT’S MOTION TO  
DISMISS THE COMPLAINT AND TO STRIKE CLASS ALLEGATIONS**

Defendant Pepperidge Farm, Inc. (“Defendant”), by counsel and pursuant to Fed. R. Civ. P. 12(b)(6) and 12(f)(2), submits this Motion to Dismiss the Complaint and to Strike Class Allegations. For the reasons discussed in the accompanying Memorandum of Law, Defendant respectfully requests that this Court dismiss all claims in Plaintiff Chad Hill’s Complaint (ECF No. 1) and strike the class allegations in Counts IV and V.

Dated: April 18, 2022

Respectfully submitted,

/s/ Igor Babichenko

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of April, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Igor Babichenko

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